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May 13, 2022

Via ECF

Hon. Robert W. Lehrburger United States Magistrate Judge **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007

Re:

Barreto Pelon, et al v. Gabi Operating Corp., et al

Docket No.: 19-cv-00502 (RWL)

Your Honor:

Our office represents Plaintiffs in the above-referenced matter. I write to respectfully request a final extension of time to file all materials necessary for preliminary approval of a Rule 23 class-wide settlement, from May 15, 2022 to Friday, June 3, 2022. This is Plaintiffs' fifth written request of its kind. The Court granted Plaintiffs' first four written requests. Defendants consent to the within request.

The parties' deadline to file their proposed FLSA Agreement is Friday, May 20, 2022. The extension requested herein will enable the parties to have additional time to finalize their proposed Rule 23 Class Action Settlement Agreement and Preliminary Approval Motion. As stated in Plaintiffs' application to the Court dated May 10, 2022, if the parties are unable to finalize the terms and conditions of their FLSA settlement agreement by May 20, 2022, then Plaintiffs will notify the court of same and respectfully request that this matter proceed with discovery or in such other manner as the Court may direct.

Plaintiffs thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ William K. Oates William K. Oates Esq. CSM LEGAL, P.C. Attorneys for Plaintiffs

Ilan Weiser, Esq. (via ECF) Attorney for Defendants

cc:

Granted. No further extensions.

SO ORDERED:

5/16/2022

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE

Certified as a minority-owned business in the State of New York